

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HELPING HAND CAREGIVERS LTD.,
an Illinois corporation, individually and
as the representative of a class of
similarly-situated persons,

Plaintiff,

V.

No. 14-cv-10127

DARDEN CORPORATION, a Florida corporation, MID WILSHIRE CONSULTING, INC. d/b/a SOCIAL WELLNESS, a California corporation, BRIAN J. KANG, GREG M. JONES, and JOHN DOES 1-12.

Hon. Manish S. Shah

Defendants.

PLAINTIFF'S STATUS REPORT REGARDING DISCOVERY
OF DEFENDANT GREG M. JONES

Plaintiff, Helping Hand Caregivers, Ltd. (“Plaintiff”), through its attorneys, submits this status report to apprise the Court of the discovery-related proceedings in California against Defendant Greg M. Jones (“Jones”):

1. The Court is aware that Plaintiff served Mr. Jones with two subpoenas, but that Jones failed to appear for a deposition in California or respond to the subpoenas.

2. On January 27, 2016, Plaintiff initiated an action in the United States District Court for the Central District of California, asking the California court to compel compliance with the subpoenas or transfer the matter back to this Court in

order to compel compliance. *Helping Hand Caregivers, Ltd. v. Darden Corporation et al.*, No. 2:16-mc-00011 (C.D. Cal.); *see id.* at Doc. 13, attached as Exhibit A.

3. On February 17, 2016, the California court granted Plaintiff's request to transfer Plaintiff's Motion to Compel Compliance with Subpoenas back to this Court. *Id.* at Doc. 18, attached as Exhibit B.

4. The matter was transferred back to the Northern District of Illinois and assigned to Magistrate Judge Sharon J. Coleman under the case number 1:16-cv-02375.

5. On February 29, 2016, Plaintiff appeared before Judge Coleman to apprise her of the matters at issue. Judge Coleman agreed that the matter is more properly heard before this Court.

6. On Monday, February 22, 2016, Defendant Jones contacted counsel for Plaintiff by telephone and stated his intention to comply with the subpoenas and hire an attorney to represent him, as well as Social Wellness, in this matter.

7. On Monday, February 29, 2016, Jones again called counsel, stating that he is looking for an attorney in California to represent him at a deposition to be taken by Plaintiff, but does not intend to hire an attorney to appear in this Court.

8. This case is scheduled for further status on April 1, 2016. Doc. 61.

9. Once the matter is transferred to this Court, or consolidated with the instant action, Plaintiff will notice for presentment its Motion to Compel Compliance with Subpoenas, if necessary.

Respectfully submitted,

HELPING HAND CAREGIVERS LTD., an Illinois corporation, individually and as the representative of a class of similarly-situated persons,

/s/ Julia L. Titolo

Phillip A. Bock
Jonathan B. Piper
Julia L. Titolo
BOCK & HATCH, LLC
134 N. La Salle St., Ste. 1000
Chicago, IL 60602
Telephone: 312-658-5500

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on March 2, 2016, caused a true and correct copy of the foregoing to be served on all parties of record by filing the foregoing through Court's CM/ECF service and served a true and correct copy of the foregoing by depositing the same in the U.S. mail at 134 N. La Salle St., IL 60602, with proper postage prepaid, to the below addresses:

Gregory M. Jones
4110 Cougar Canyon Rd.
Hemet, CA 92545
Defendant

Brian J. Kang
3185 Wilshire Blvd., Apt. 484
Los Angeles, CA 90010
Defendant

Mid Wilshire Consulting, Inc.
c/o Brian J. Kang
3185 Wilshire Blvd., Apt. 484
Los Angeles, CA 90010
Defendant

/s/ Julia L. Titolo
One of the attorneys for Plaintiff